

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>In re Ethicon, Inc. Pelvic Repair System Products Liability Litigation</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:</b> <i>Cutter v. Ethicon, Inc.</i> 2:12-cv-01790; <i>Bates v. Ethicon, Inc.</i> 2:12-cv-02020; <i>Daugherty v. Ethicon, Inc.</i> 2:12-cv-02076; <i>Morrison v. Ethicon, Inc.</i> 2:12-cv-02141; and <i>Miller v. Ethicon, Inc.</i> 2:12-cv-02187	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**MOTION TO EXCLUDE EXPERT TESTIMONY OF MICHAEL KARRAM, MD**

Plaintiffs in the above-captioned consolidated case respectfully move this Court to exclude the testimony of Michael Karram, M.D., a proffered expert witness for the Defendants, regarding the safety and efficacy of Ethicon's Prolift and TVT-O mesh products. Dr. Karram does not possess the necessary qualifications to render many of his opinions, which is the first requirement for an expert witness to satisfy under the Rules. He selectively reviewed and considered data – even within the same source – which is an unacceptable methodology. Dr. Karram's personal experience and practicing opinions differ from his litigation opinions. Finally, Dr. Karram did not analyze or explain contrary data when reaching his opinions.

Because Dr. Karram has not established that he followed a reliable methodology to reach his opinions, his opinions do not satisfy the requirements for expert witness testimony as set forth in Rule 702 and under the *Daubert* standard. For the reasons set forth in the accompanying Memorandum, Dr. Karram should not be allowed to testify as an expert witness and Plaintiffs respectfully request the Court strike his opinions in their entirety.

1. List of cases to which this Motion applies, attached as Exhibit 1.
2. Expert Report of Michael Karram, M.D., attached as Exhibit 2
3. Deposition transcript of Michael Karram, M.D., attached as Exhibit 3

Respectfully submitted this 21<sup>st</sup> day of July, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on July 21<sup>st</sup>, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the list of participants registered to receive service in this MDL.

/s/ Joseph J. Zonies